

**DISCOVERY PLAN WORKSHEET**  
(for Fair Debt Collection Practices Act ("FDCPA") Cases)

Deadline for completion of Rule 26(a) initial disclosures:  
(*Presumptively 30 days after filing date*)

First request for production of documents and for interrogatories  
due by:  
(*Presumptively 60 days after filing date*)

Motion to join new parties or amend the pleadings:  
(*Presumptively 90 days after filing date*)

COMPLETION OF ALL DISCOVERY, including all expert disclosures  
under Rule 26(a)(2), if any, to be completed by:  
(*Presumptively 120 days after filing date*)

Do the parties wish to be referred to the EDNY's mediation  
program pursuant to Local Rule 83.8?